

Bob Brister
PO Box 2808
Oakhurst, CA 93644
(559) 641-7427
bbrister@igc.org

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May 9, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

To whom it may concern:

I am writing to request that the comment period be extended past May 18. Food treated with radiation should be indefinitely labeled with the radura and a statement indicating it was treated with radiation. The absence of such a statement would be misleading because irradiation destroys vitamins and causes changes in sensory and spoilage qualities that are not obvious or expected by the consumer. The public has a right to be informed.

I support the recommendation by the Center for Science in the Public Interest regarding labeling of irradiated foods:

"any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling.

I recognize the radura as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and radura) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the radura, new consumers (e.g., young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone. If there is no label, consumers will be misled into believing the food has not been irradiated.

Sincerely,



Bob Brister

98N-1038

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